

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Andrew Schapiro (*Pro Hac Vice*)  
3 *andrewschapiro@quinnemanuel.com*  
4 191 N. Wacker Drive, Suite 2700  
5 Chicago, IL 60606-1881  
6 Telephone: (312) 705-7400

7 David Eiseman (Bar No. 114758)  
8 *davideiseman@quinnemanuel.com*  
9 50 California Street 22nd Floor  
10 San Francisco, California 94111-4788  
11 Telephone: 415-875-6600  
12 Fax: 415-875-6700

13 Stefan Berthelsen (*Pro Hac Vice*)  
14 *stefanberthelsen@quinnemanuel.com*  
15 51 Madison Ave 22nd floor  
16 New York, NY 10010  
17 Telephone: (212) 849-7014

18 *Attorneys for Plaintiff*  
19 *X Corp.*

20 **UNITED STATES DISTRICT COURT**  
21  
**NORTHERN DISTRICT OF CALIFORNIA**

22 X CORP., a Nevada corporation,

23 Case No. 3:23-cv-03698-WHA

24 Plaintiff,  
25 vs.

26 **DECLARATION OF ANDREW H.  
27 SCHAPIRO IN SUPPORT OF  
28 PLAINTIFF'S MOTION FOR LEAVE  
TO AMEND COMPLAINT**

29 BRIGHT DATA LTD., an Israeli  
30 corporation,

31 Defendant.

32

33

34

35

36

37

38

1 I, Andrew H. Schapiro, submit this declaration on behalf of Quinn Emanuel Urquhart &  
2 Sullivan, LLP and hereby state under penalty of perjury as follows:

3 1. I am a partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn  
4 Emanuel”), and I am Quinn Emanuel’s lead counsel for Plaintiff X Corp. (“Plaintiff” or “X”) in this  
5 matter.

6 2. I make this declaration in support of Plaintiff’s Motion for Leave to Amend Complaint  
7 (the “Motion”), and I have personal knowledge of the information contained herein.

8 3. Attached as Exhibit A to the Motion is a true and correct copy of Plaintiff’s Proposed  
9 Second Amended Complaint in this matter, including the exhibits to the Second Amended Complaint,  
10 which were also filed as exhibits to the First Amended Complaint.

11 4. Attached as Exhibit B to the Motion is a true and correct copy of a Redline Between  
12 First Amended Complaint and Proposed Second Amended Complaint.

13 5. I declare under penalty of perjury under the laws of the United States of America that  
14 to the best of my knowledge the foregoing is true and correct.

15 Executed on June 6, 2024 in Chicago, Illinois.

16  
17 By: /s/ Andrew H. Schapiro  
18 Andrew H. Schapiro